

LATHAM & WATKINS LLP
 Matthew Rawlinson (CA Bar No. 231890)
matt.rawlinson@lw.com
 140 Scott Drive
 Menlo Park, CA 94025
 Telephone: +1.650.328.4600

Morgan E. Whitworth (CA Bar No. 304907)
morgan.whitworth@lw.com
 505 Montgomery Street, Suite 2000
 San Francisco, California 94111
 Telephone: +1.415.391.0600

Susan E. Engel (*pro hac vice*)
susan.engel@lw.com
 555 Eleventh Street, N.W., Suite 1000
 Washington, D.C. 20004-1304
 Telephone: +1.202.637.2200
 Facsimile: +1.202.637.2201

Attorneys for Defendant Solana Labs, Inc.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

MARK YOUNG, on behalf of himself and all
 others similarly situated,

 Plaintiff,

 v.

 SOLANA LABS, INC., THE SOLANA
 FOUNDATION, ANATOLY
 YAKOVENKO, MULTICOIN CAPITAL
 MANAGEMENT LLC, KYLE SAMANI, and
 FALCONX LLC,
 Defendants.

Case No.: 3:22-cv-03912-JD

**DECLARATION OF MATTHEW
 RAWLINSON IN SUPPORT OF
 STIPULATION AND [PROPOSED]
 ORDER CONTINUING CASE
 MANAGEMENT CONFERENCE AND ALL
 ASSOCIATED DEADLINES**

(Civil L.R. 6-1, 6-2, 7-12)

Hon: James Donato

I, Matthew Rawlinson, hereby declare as follows:

1. I am an attorney admitted to practice law in the state of California and an
 associate at Latham & Watkins LLP, counsel of record for defendant Solana Labs, Inc.
 (“Solana”) in the above-captioned action. I submit this declaration in support of the parties’

1 Stipulation Continuing Case Management Conference and All Associated Deadlines I make this
 2 declaration based on my personal knowledge.

3 2. On July 1, 2022, Plaintiff filed a complaint captioned *Mark Young, on behalf of*
 4 *himself and all others similarly situated, v. Solana Labs, Inc., The Solana Foundation, Anatoly*
 5 *Yakovenko, Multicoin Capital Management LLC, Kyle Samani, and FalconX LLC* in the above-
 6 captioned case alleging violations of the Securities Act of 1933 and the California Corporations
 7 Code (the “Complaint”) against Defendants Solana Labs, The Solana Foundation, Anatoly
 8 Yakovenko, Multicoin Capital Management LLC, Kyle Samani, and FalconX LLC (collectively,
 9 the “Defendants”)

10 3. On July 6, 2022, this Court issued an Initial Case Management Scheduling Order
 11 with ADR Deadlines, setting the Initial Case Management for September 29, 2022 (Dkt. 9).

12 4. This action asserts claims under the Securities Act of 1933, which is governed by
 13 the Private Securities Litigation Reform Act of 1995 (the “PSLRA”). *See* 15 U.S.C. § 77z-1 et
 14 seq. Under 15 U.S.C. § 77z-1(b)(1), absent a court order, all discovery and other proceedings are
 15 stayed during the pendency of any motion to dismiss. The PSLRA also provides for
 16 consolidation of all related actions and the appointment of lead plaintiff and lead counsel. *See* 15
 17 U.S.C. § 77z-1(a).

18 5. On August 1, 2022, Plaintiff and Solana Labs filed a Stipulation to Extend time to
 19 Respond to the Complaint until after the selection of Lead Plaintiff (Dkt. 26).

20 6. The last day to file motions to serve as lead plaintiff, is September 6, 2022 (Dkt.
 21 20-1)l there were two (2) motions filed by that date.

22 7. Briefing on the motions to serve as lead plaintiff will not be complete until
 23 September 27, 2022, at the earliest, which is just two days before the Initial Case management
 24 Conference is scheduled

25 8. The Parties anticipate that the eventual lead plaintiff will file an amended
 26 complaint and Defendants will file one or more motions to dismiss the claims asserted against
 27 them.

9. Defendants are complying with their obligation to preserve relevant documents and information while discovery is stayed.

10. Counsel for the plaintiffs and defendants in the above-captioned action respectfully submit that good cause exists to continue the Initial Case Management Conference, scheduled for September 29, 2022 and all ADR Multi-Option Program deadlines, shall be vacated and reset following the appointment of lead plaintiff and lead counsel.

11. This is the second extension of time the parties are requesting.

12. No other deadlines in this action will be affected by this extension other than those specified in the accompanying stipulation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7th Day of September 2022, in Menlo Park, California.

/s/ Matthew Rawlinson
Matthew Rawlinson

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